

1. I, Dawn Keefer, declare that the following statements are true to the best of my recollection:
2. I am a plaintiff in the above-referenced lawsuit.
3. I live in York County, Pennsylvania.
4. I am the Pennsylvania State Representative for the 92nd District and a candidate for the Pennsylvania State Senate.
5. I have served on the House State Government Committee for approximately six years and participated in more than 80 hours' worth of election hearings, on-site election facilities visits and trainings, and voting meetings and have been presented with, and witnessed an expansive complement of election facilitation breakdowns and failures throughout the Commonwealth of Pennsylvania.
6. I have challenged the County of York when they failed to administer a free and fair election in 2019 when the county failed to secure the appropriate quantity of equipment necessary to administer a secure and non-discriminatory election and forced a solution.
7. I have challenged and advocated against the usurpation of legislative powers by the executive and judicial branches.
8. In 2020, numerous election laws were ignored and changed through actions by the Executive Branch that I believed were unlawful. My rights as a legislator were violated over and over and the people of Pennsylvania suffered as a result.
9. The ever-changing rules for the election created a lack of trust and confidence in the elections in PA and those wounds cannot heal as long as the Executive Branch continues to usurp the rights of the PA General Assembly to determine the manner of elections in the Commonwealth.
10. The executive has no power to interpret legislation and yet the PA Department of State through a host of Guidances and Directives have done just that. Worse, these guidances and directives contradict existing laws related to the conduct of elections.
11. The Constitution of the United States of America and the Constitution of the Commonwealth of Pennsylvania divides the government into three branches: Legislative, Executive and Judicial.

12. The Pennsylvania House of Representatives is a part of the Legislative Branch of Government and as such is tasked in part with making all laws.
13. The Executive Branch is responsible for the implementation of laws passed by the Legislative Branch. According to the Constitution, the Executive Branch cannot not make laws.
14. As a State Legislator, I represent the people in my community. I am the voice of my constituents and I help draft and pass laws that I believe are in the best interest of the people I represent.
15. The Secretary of the Commonwealth is a political appointee of the Governor and has no authority to make laws or ignore laws passed by the legislature. When the Secretary or the Governor exceed their authority, they nullify my vote and take away the voice of my constituents.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 11, 2024

/s/Dawn Keefer